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**Pro hac vice* applications pending

12 Attorneys for Plaintiffs

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

15 CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
16 G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,
17 Plaintiffs,

18 v.

19 UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
20 BUREAU OF PRISONS DIRECTOR COLETTE
PETERS, in her official capacity; FCI DUBLIN
WARDEN THAHESHA JUSINO, in her official
capacity; OFFICER BELLHOUSE, in his
individual capacity; OFFICER GACAD, in his
individual capacity; OFFICER JONES, in his
individual capacity; LIEUTENANT JONES, in
her individual capacity; OFFICER LEWIS, in his
individual capacity; OFFICER NUNLEY, in his
individual capacity, OFFICER POOL, in his
individual capacity, LIEUTENANT PUTNAM, in
his individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ, in
her individual capacity,

28 Defendants.

Case No. 3:23-cv-04155

**DECLARATION OF DIANA
BLOCK IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION
AND PROVISIONAL CLASS
CERTIFICATION**

Trial Date: None Set

DECLARATION OF DIANA BLOCK

I, Diana Block, declare:

3 1. I am a party in the above-entitled action. I have personal knowledge of the
4 facts set forth herein, and if called as a witness, I could and would competently so testify.
5 I make this declaration based in support of Plaintiffs' Motion for Preliminary Injunction
6 and Provisional Class Certification.

7 2. I am a member of the leadership of California Coalition for Women
8 Prisoners (“CCWP”) and am authorized to make representations on behalf of CCWP in the
9 above captioned matter.

10 3. CCWP is a membership organization whose members constitute currently
11 and formerly incarcerated women and transgender individuals.

12 4. CCWP's mission is, among other things, to challenge the institutional
13 violence imposed on women, transgender people, and communities of color by the prison
14 industrial complex.

15 5. In seeking to accomplish its mission CCWP prioritizes the voices of those
16 inside prison and has a leadership and membership entirely comprised of currently and
17 formerly incarcerated people.

18 6. Currently CCWP has a membership of approximately 220 members.
19 Approximately 120 of these members are currently incarcerated and 100 are currently
20 outside prison or jail.

21 7. CCWP was founded in 1995 after women filed lawsuit against the California
22 Prison system alleging inadequate medical care.

23 8. Currently incarcerated members reside in the following facilities:

- FCI Dublin
- Central California Women's Facility
- California Institute for Women
- San Francisco County Jail
- Alameda County Jail

1 9. Among other services, CCWP advocates for members on the inside,
 2 including advocacy for services and medical care, provide mutual aid, and provides
 3 services and information regarding reentry after incarceration.

4 10. Most incarcerated members correspond regularly with CCWP through the
 5 “Writing Warriors” program, one of CCWP’s 10 working groups.

6 11. Incarcerated members, along with receiving services and participating in the
 7 Writing Warriors program are also provided copies of “the Fire Inside” a newsletter by,
 8 for, and about those incarcerated in women’s prisons in the United States.

9 12. Members make all decisions within and governing CCWP. Day to day
 10 decisions are made by a coordinating committee comprised of members and the whole
 11 membership has the ability to vote on larger structural changes to the organization.

12 13. Since CCWP’s inception we have received communication from those in
 13 FCI Dublin concerning conditions in the facility, including sexual abuse perpetrated by
 14 guards.

15 14. These communications have only increased in recent years and many of our
 16 members have reported sexual abuse committed by officers who have been criminally
 17 charged and indicted for such abuse.

18 15. We regularly hear reports of sexual harassment, abuse, and retaliation from
 19 members in FCI Dublin. These reports come to us via letter, telephone call, and through
 20 numerous in person visits we have made to members or potential members inside FCI
 21 Dublin.

22 16. Our members have been severely injured both by the sexual abuse itself as
 23 well as by the retaliation against those that report which include being punished with
 24 housing restrictions and unnecessary cell searches.

25 17. Our members in FCI Dublin remain in constant fear of sexual assault and
 26 retaliation because of the long history of such actions at FCI Dublin and because of the
 27 continuing system of impunity at the facility.

28 18. Our members are at regular risk of harm at FCI Dublin and, as a result,

1 CCWP has spent significant organizational time and resources meeting and
2 communicating with members, advocating for individual members, advocating with BOP
3 for system wide change and accountability and otherwise supporting those in FCI Dublin.

4 19. These additional efforts would be unnecessary if FCI Dublin were to enact
5 system wide change to address the issues of sexual abuse and retaliation and to provide
6 confidential reporting mechanisms, and safe and effective third party medical and mental
7 health treatment.

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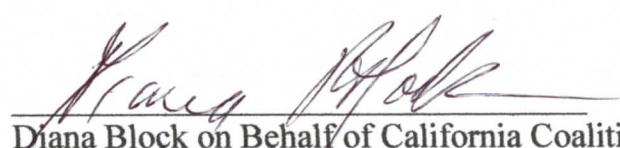
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2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge, and that this declaration is
4 executed in San Francisco, California this 14th day of August, 2023.

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7 Diana Block on Behalf of California Coalition for
8 Women Prisoners
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DECLARATION OF DIANA BLOCK ON BEHALF OF CALIFORNIA COLATION FOR WIMEN PRISONERS
IN SUPPORT OF PLAINTIFFS' MOTIONS FOR PRELIMINARY INJUNCTION AND PROVISIONAL CLASS
CERTIFICATION